

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

UNITED STATES OF AMERICA )

v. )

ADRIAN ANDERSON )

Criminal No.: 3:22-CR-00001

**STATEMENT OF FACTS**

The parties stipulate that the allegations contained in the First Superseding Indictment and the following facts are true and correct, and that had this matter gone to trial, the United States would have proven each of these facts beyond a reasonable doubt.

Markel “Kel” MORTON, recruited Quincy “Boosie” BROCK, Adrian “A-1” ANDERSON, and Corey KINNEY to rob a local drug dealer. MORTON promised his co-conspirators that there would be approximately \$50,000 in cash from drug proceeds concealed at a location believed to be one of the drug dealer’s stash houses. In furtherance of this plan, on or around August 19 and August 20, 2021, MORTON, BROCK, and others conducted surveillance of the location believed to be the drug dealer’s “stash house,” which was an apartment rented by S.H.D., located in the Treesdale Apartments complex in Albemarle County. Albemarle County is in the Western District of Virginia.

On August 20, 2021, at approximately 8:50 p.m., BROCK, ANDERSON, and KINNEY forced entry in the apartment of S.H.D., as was planned with MORTON. S.H.D. believes it was KINNEY who held her at gunpoint, while BROCK took her keys and searched her vehicle and ANDERSON searched her apartment. During the robbery, BROCK, ANDERSON, and KINNEY took S.H.D.’s cellphone and other items from her apartment. All were armed with a firearm. Security video from the apartment complex shows the co-conspirators entering and fleeing the apartment.

BROCK, ANDERSON, and KINNEY returned to MORTON’s location in Albemarle County, where MORTON then insisted that they attempt to locate the drug dealer’s stash at his mother’s residence on Prospect Avenue. Prospect Avenue is located in Charlottesville, which is in the Western District of Virginia. Security video footage then shows MORTON, ANDERSON, BROCK, and KINNEY leaving their planning location and getting in a vehicle being driven by MORTON a few minutes after 9:00 p.m. on August 20, 2021. All four men were armed with firearms. All four men then traveled to Prospect Avenue, where BROCK and MORTON entered O.B.’s apartment and stole a safe containing approximately \$50,000 belonging to the drug dealer. As they fled O.B.’s apartment, either BROCK or MORTON pointed their firearm at J.H., who was standing outside of the apartment. BROCK and

*Defendant’s Initials:* AA

MORTON then fled out the back of the apartment building.

The actions taken by ANDERSON as described above were taken willfully, knowingly, and with the specific intent to violate the law. ANDERSON did not take those actions by accident, mistake, or with the belief that they did not violate the law. ANDERSON acknowledges that the purpose of the foregoing statement of facts is to provide an independent factual basis for his guilty plea. It does not necessarily identify all of the persons with whom the defendant might have engaged in illegal activity.

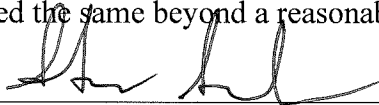
Respectfully submitted,



Heather L. Carlton

Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day, I stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



Adrian ANDERSON, Defendant

I am Adrian ANDERSON's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Donald Pender, Esquire  
Counsel for Defendant

Defendant's Initials: 